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October 04, 2022

VIA ECF

**The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 18C
New York, New York 10007-1312**

Re: United States v. Stone, 1:22-cr-510-MKV
Consented-to Motion to Modify Conditions of Release

Dear Judge Vyskocil:

I am writing on behalf of our client, Defendant David Stone, to request a modification of his conditions of release so that he and his wife can travel outside the District of Idaho to Oregon, to visit his mother-in-law, who is very ill. This motion is unopposed by the government, as well as Mr. Stone's supervising United States Pretrial Service Officers.

On May 11, 2022, United States Magistrate Judge Kathleen Parker conducted a hearing in Mr. Stone's case. Judge Parker granted Mr. Stone's release on various conditions agreed to by the parties. [Dkt 6] One such condition restricted Mr. Stone's travel to the Southern District of New York, the District of Idaho (where Mr. Stone resides with his wife and children), and points in between (to facilitate his travel to court proceedings). Judge Parker also imposed the requirement that Mr. Stone be actively supervised by a United States Pretrial Services Officer.

Mr. Stone respectfully requests the Court to modify his conditions of release to allow him and his wife, as well as their children, to travel to Oregon between October 6-10, 2022, to visit his mother-in-law, who is elderly and currently very ill. Mr. Stone had hoped to go on this brief trip earlier, but he and his wife postponed making such a request, given that he had to travel to New York for his change of plea hearing on September 23rd.

In connection with this request, I contacted Crystal Laleman, the United States Pretrial Services Officer in the District of Idaho tasked with supervising Mr. Stone. Officer Laleman advised that to date, Mr. Stone has fully complied with all of the Court's conditions of release; therefore. Officer Laleman further indicated that she had contacted

the United States Pretrial Services Officer in the Southern District of New York who is assigned to Mr. Stone's case and that this officer likewise had no objection to the instant request. Additionally, I contacted opposing counsel to inquire as to the government's position regarding this travel request. Counsel for the government graciously indicated that as long as the request was approved by Pretrial Services, they had no objection to the requested modification of Mr. Stone's conditions of release.

I would simply add that Mr. Stone has remained in frequent contact with counsel and has always made every scheduled appointment. He and his wife traveled on relatively short notice from the District of Idaho to the Southern District of New York for his change of plea hearing on September 23, 2022.

Given the approval from United States Pretrial Services, the government's non-objection, and the observations from counsel concerning his ongoing compliance, we respectfully ask the Court to modify the travel restriction originally imposed by Judge Parker to allow him to travel from the District of Idaho to the State of Oregon between October 6-10, 2022, so that he can visit his sick mother-in-law.

Should the Court grant this motion, Mr. Stone fully understands that all other conditions of release originally imposed by Judge Parker, and reiterated by Your Honor at the conclusion of his change of plea hearing, would remain in full effect. Mr. Stone also has been advised and fully understands that any failure to return by the designated date to the District of Idaho would constitute a violation of the Court's release conditions and would subject him to immediate arrest and potentially additional criminal penalties.

Should the Court have any questions or concerns regarding this unopposed motion to modify Mr. Stone's conditions of release, I would be happy to make myself available for a conference at short notice.

Respectfully submitted,

/s/ Thomas Monaghan

Thomas Monaghan

Thomas Monaghan Law, PLLC

Attorney for Defendant

David Stone